**The Basics of Research Administration 2013  
Denver, Colorado**

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Day One: **Presenters**

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Higher Education Division

Pre WWII:

* Federal Science policy back to 1787.
* Patents and inventions
* Agriculture
* Policies pertaining
* Dr. Beasly SRA Historian
* Moral Act: Land Grant Institutions
* Hatch Act: Research
* Smithsonian, etc.
* LOC

1940-45

* Military
* Antibiotics
* James Conan: FDR Mobilize scientific research for war
* Nat Scientific Research Council
* Manhattan Project

1945-50: Start of research Administration

* NSF 1950
* Atomic Energy Commission: Us, profit, nonprofits

Next 30 Years

* Recruit scientists
* OSPs started on campuses
* RAs getting established
* SRA was formed 1966
* Industry and nonprofits, Universities combined

Tax supported information with accountability attached.

RA protects institutions and researchers.

Facilitate sponsored programs: do the researchers paperwork

Ensure compliance

Owl story transitioning from animals to humans without telling anybody.

Judy:

MAJOR ROLES: none can work alone

* PI: Develops and proposes the project
* Departmental Admin: can have departments that have their own staff to run grants and then small single rouge PIs running their own grants. Fred much more in this area with our OSP office.
  + Flexibility is critical because the rules always change.
* Assist PI
  + Prepping budgets, proposal, pre and post award in OSP.
  + PI has to work collaboratively with us to make sure all the rules and laws, etc.
* Division Admin: Deans, VP, Provost
* Central: unit overseeing all oversight. RF: Maggie/Kevin/Brown/Heidi/Cathe
  + Proposal policies and procedures: follow directions.
  + RF does a lot of this: tech transfer
* Executive Administration:
  + Oversees OSP and is responsible for compliance
  + Kevin’s office
  + Keeps stories straight
  + Culture of the Institution
  + Relationships with sponsoring institutions

Process of RA:

* Idea
* Proposal
* Submit
* Negotiate and accept award?
* Research, Instruction, Other

Award Mechanisms (John)

* Story about call from sponsor on a person’s pay grade. $45,000 or $60,000 K99(?). Can’t give her a raise: doesn’t depend on the sponsor, but on the initial agreement and budget.
* Grant: faculty initiated project.
  + Noncarbon fuel ideas
  + Ideas generated
  + Proposals
  + Follow scientific method: works or not.
* Contract
  + Procurment action: expectation is to accomplish what you said you were going to do.
  + Fail: can get fired and give to someone else. The extra cost is on you.
* Cooperative Agreement
  + Grant like:
  + Sponsor plays an active role
  + Talent together, their in lab with you.
* Gift:
  + With restrictions and requirements
  + Work with humans or animals requires rules
  + Deliverables
* Subagreements
  + Scope of work
  + budget
  + reports
  + go to sponsor
  + terms and conditions of original grant
  + Govt. can audit: and if the subcontractor didn’t do the job, comes from original grant who responsible. Sub fails, your problem.
  + Can’t happen on a handshake
  + Cutting someone loose: admiration level decisions come into play.

Governing Principles

* Laws and regs
  + State, territories, and local
  + Can be more strict, not less
* Sponsor policies
  + NIH: where to find the answer, like salary caps.
  + Can govern indirect costs, salaries, allowable and the opposite
* Institutional policies:
  + Cost sharing
* Audits: are governed by these policies

Types of Sponsored:

* Federal
* State:
  + Utah Dept. of Transportation
  + Get 100% fed funds and charge us state regulated . . .
* Local:
  + REDC
* Nonprofits
  + Getting more regulations and terms
  + Invention making $? Share with us.
* For-Profits
  + Contract perspective:
  + Expect things to get done.
  + They get sued, we get sued
* International
  + New box of cats
  + Cultural differences: wrong color flowers can offend
  + Currency fluctuations: Caribbean currency devalued by half. SUV into another country
  + Language: contract all in Spanish
* Due tomorrow, good luck.
* Pass-through: You can’t give me anything worse than they agreed with initially.
  + See initial regulations and what applies?
* 85% of issues can be resolved in pre-award, providing there’s enough time.

Q&As:

* CEU Credits? For CRAs. Continuing education units.
* Technology transfer. New idea protected by law: copyright, patent, algorithm, protected. “what I do I own.”
  + Make sure you read the sponsoring language to make sure what being stipulated.
  + Mouse story: sponsor said it owned everything if it used his mice. The mouse man was happy to turn it down because he would have lost his patented/protected.
  + Owl Story: have a protocol in place to take care of them when the research is concluded. He let them die, he was in deep.
    - RAs: could/should have read his proposal to see that he complied with laws and dregs. Department should have had eyes on it. The committee in charge should have been following the rules. Once central admin is involved, they have to report.

**PRE-AWARD**

* Idea
* Find funding
  + Individual; institutional OSP office, personal connection, approached by sponsor: industry, napkin deal, walks in with check.
* Types:
* Solicited
  + RFP
  + RFQ: request for quotation
  + RFA for application
  + Limited submissions: one per institution. Need procedures to make sure no one else is submitting.
* Unsolicited:
  + PA: Program Announcement: Make sure PI is in the right area.
  + Funding opportunities
  + Letters of interest/white papers: NASA, DOD: asking for preproposal. If invited to apply, but find out what the preproposal ties the PI to; budget iron clad all the way through. OSP office needs to be in there: chair, dean, etc. Routing sheet. **To have the authority to submit the proposal.**
* Common online information systems:
  + Commerce business daily
  + FedBizOpps.com
  + Fedconnect.net
  + Fed Register
  + Grants.gov
  + Researchresearch.com
* Agency specific sites:
  + DARPA
  + DOD
  + DED
  + EPA
  + NASA
  + NIH
  + NSF
  + DOD is funding breast cancer research. Check across for topic, not the agencies specialty.
  + Look for more cross collaborative research: get funding from cross functional agencies. Economics and bio. Surgery and engineering. Center Grants.
* Components of funding announcements are spelled out in the RFP etc.
  + Budget restrictions
  + Submission deadlines
  + Dates of project
  + Review process and criteria
  + Expected award decisions (date)
  + Agency contacts.
  + Example CFDA 81.049. <https://www.cfda.gov/?s=program&mode=form&tab=step1&id=8641b1a1f6a71f54e430404e72c90bcf>
  + NSF handout
* See book for Find Funding.
  + Career development for our new folks: nsf
  + Service are goofy

**Proposal Writing:**

* Grant writing
  + Pre proposal: LOI asking for ideas on a new idea
  + New proposal:
  + Non competing continuation: end of a 5 year cycle, just continue with progress report and if right, refunded.
  + Competing renewal: liked, but have to start over with an advantage: infrastructure, owns the tech, etc.
  + Resubmission: follow reviews closely. NIH allows two times. Careful of concurrent submissions.
    - **Have people who have worked as reviewers do workshops. Nancy Gee.**
  + Read everything for compliance. Millions dollar w/50% match. Do you have it?
  + Can you do everything the restrictions define, not what the PI wants.
* Successful Proposal:
  + Meet sponsor needs
  + Directed narrative reviewers
  + See book for all
  + Clear and concise
  + Persuades and justifies
  + Think of it like a resume: complex and messy gets thrown out. Make it easy to read.
  + Organized
  + Follow directions
  + Just enough information
  + No budget problems
  + Good overall presentation package: design
  + Early preparation: if late **I can’t promise my best work, if** electronic submission and there’s not enough time, no guarantees. I can’t promise it will be submitted if you don’t play by some of the rules.
  + Bust their chops with compassion
* Cover Page: see book.
* Abstract: proposal in lay terms. Institution required.
* Methodology:
  + Problem/ needs statement
  + Goals/specific aims
  + Measurable objectives
  + Procedures
  + Evaluation: self measurement
  + Dissemination: reproduce and validate. U of UT and cold fusion. Nobody could reproduce the results.
  + Timeline: plan goes wrong, did timeline have room for erros and struggles
* Budget:
  + Complete
  + Adequate to cover the scope of work
  + Within sponsor norms
  + Follow sponsor and institutional guidelines:
  + Consistent with narrative
  + Justified clearly
* Personnel
  + Describe their purposes in the narrative
  + Budget justification will need personnel responsibilities summarized and level of effort.
    - This needs to be spelled out clearly
    - Is 10% enough time to carry out the proposed work
    - Do they have the ability to get the work done
    - Right credentials
    - Argument for not including people who just want to sign on for their own benefit.
* Facilities and resources:
  + Describes what equipment and space is available
  + What if a space is funded and the space is in use? Can’t put two people in one place.
  + Can you get the work done with what you have?
  + Describes computers.
* Compliance:
  + Human and animal subjects: can become public very quickly.
  + Environmental health and safety issues.
  + Can bring down the whole project
  + **Read the science: see animal or human start asking questions.**
  + Make sure IACUC
  + Nuclear labs
  + Biological components with disposal issues.
* Consortium/contractual
  + See all proposals from 3rd parties
* Appendices:
  + Dictated by sponsor: watch for limitations
  + Can be kicked out for this: might make it through grants.gov, but never make it to the review committee
  + Biosketches
  + Proof of tax exempt status
  + Examples for prior work: call them up
  + Sample instrument: **boiler plate** we work with
    - Subcontract agreements
  + Whatever else you can cram in without getting rejected.
* Budget Development
  + Governing regulations (CFRs, OMB circulars, etc.)
    - Federal side: this tells us what’s allowable: DC or ID costs.
    - Flintstone principle yabutyabut: Institutional regulations for spending
  + Sponsor regulations
  + Direct expenses vs. facilities and administrative (F&A) expenses
  + Sponsor request vs. intentional resources (cost sharing)
    - Who is paying for it?
    - **If it’s not allowable to sponsor its not allowable as a cost share.**
    - What you have to come up with outside the grant dollars.
  + See page 39 of book for the list of circulars with their regulations. Cost principals.
    - **A-133:** if you use federal money, this is the guidebook for how to use it.
  + **U.**S. Governing Regulations: Federal Acquisition Regulations: (FAR) FAR – Part 52: [www.acqusition.gov/far/current/html/52\_301Matrix.html](http://www.acqusition.gov/far/current/html/52_301Matrix.html)
* **Cost Principals:**
  + **Allowable**
    - Directly benefits the project
    - Eligible for reimbursement by sponsor
    - Sponsor guidelines do not place restrictions regarding the expense
    - Institution does not place restrictions on the expense
    - When in doubt throw it out.
    - Examples of allowable costs:
      * Personnel costs in the proportion to performance of the scope of work
      * Supplies
      * Equipment
      * Project related travel
      * Services for the performance of the scope of work
      * Pre-award costs
  + **Reasonable:**
    - A prudent person would agree the expense is necessary
    - Able to allocate to one or more project objectives.
    - Would you as a taxpayer agree with the expenditure.
  + **Allocable**: spending down with extra cash drive a lot of these problems.
  + **Consistently treated**: usually salaries. Can’t charge things to the end of a grant just because you have money left. If you didn’t do it from the beginning, it won’t wash with auditors.

RA Listserv for questions. Being emailed.

AFTERNOON SESSION

Budget Development

**Direct Costs**: Clearly identifiable costs related to a specific project

**F&A: Indirect Costs**: costs related to expenses incurred in conducting or supporting research or other externally funded activities but not directly attributable to the specific grant. If it goes up and was negotiated for as escalating, then it can go up year to year. A provisional rate might kick in during the year the ID rate is being renegotiated.

**Cost Sharing**: don’t do it. Urban myth that it helps. Parking charges.

* Avoid if possible
* **Voluntary**: institution buys something. Once proposed, must be provided, tracked and recorded.
* Separately tracked and reported. Most common mistake is the cost share is not tracked the same way the direct costs were tracked.
* **Mandatory**: agency requires a one-to-one match
* **Voluntary Uncommitted**: not defined at time of proposal even then if the cost is incurred and is not booked and tracked. Nothing quantifiable.
* Classifications of: In-kind and Cash
* Sponsor views total cost of a projects as: sponsor request + cost sharing = total.

Somebody incurs a cost in the proposal that is not covered by the sponsor. What do you do? What is the institutional policy?.

**Tracking Cost Share: if mandatory and quantifiable has to be tracked the same way direct costs are tracked. Labor it has to be in HR. Need a methodology to meet these standards or it’s not an allowable cost. Must meet the standard. Sanctions? You can be disallowed. The proposal becomes a contract to fulfill the cost share. If not documented they can say you have not proven you did the work, so you violated the contract. Funds will have to be returned. Auditors will see it as low hanging fruit. A133 audit. Monthly reconciliation by the departments and post-award should be tracking cost share.**

Indirect cost calculations are affected by cost share over time.

“We don’t do anything because we used to do it that way.” Quote of the day.

Budget Building:

* **Direct expenses**
  + Sponsor requested
  + Institutions cost share
* **F&A expenses indirect:** remains the same thru the length of the project**.**
* **Cost escalation**: rates change: fed at zero %. If zero, the salary remains the same and if we include a cost of living becomes cost sharing or reduces your direct cost amount. Modular budgets can allow you to include raises as by Institutional policy consistency applied. Or if institutionally obligated to pay the raise, you’ll have to renegotiate later with the sponsor. No bonuses.
* **Justification**: as important as the budget. Modular: (NIH RO1: $25,000 chunks) can’t go over $250,000 a year over years. No detail budget for salaries, equipment, etc. NIH might not require a detailed budget, but we need justification to make sure all costs are allowable.

**Personnel**:

* **Salaries and wages**
  + IBS: institutional based salary. Define it for consistency across submissions.
  + Must reflect effort
  + NIH salary limitations
  + Graduate/undergraduate student salary
  + Technical support
  + Clerical support
  + Post doc associates
* **Fringe benefits** 
  + Federal rates, if negotiated
  + Dependent care rates, if exist
  + Review institutional policy:
  + Rates may change based on employment status
  + Your institution’s guidelines
* **Supplies and materials**
  + Must be specific to project
  + Avoid general purpose items,
  + “Major project” exception (F.6.b)
  + Examples of allowable supplies
* **Equipment**
  + Sponsor requirements and regulations
  + Institutional capitalization policy
    - May only be as high as a fed policy, but are free to set at a lower level.
  + Usually exclusive use by project: buy early on.
  + Should be itemized and justified – in some cases quotes are needed; also quotes tend to help.
  + Ownership can be with sponsor or institution.
* Consultants / subrecipients
  + Scope of work
  + Costs
  + Rate determination,
  + Commitment to perform
  + Monitoring and reporting
* **Subcontractor vs consultant vs vendor – matrix. Ouch.**
* Travel
  + Institutional policy governs: matrix for inclusion is good idea.
  + Sponsor guidelines govern
  + Foreign travel fly America act
  + Mileage allowances
  + Joint travel regulations (JTR)
  + Institutional processing international
* Communications
* Publications
* Incentives (human subjects)
* Animal per diem
* Rental of equipment or facilities

F&A: Facilities and Administration

* What are F&A costs?
* Know your rate and base
  + On and off camps
  + Research
  + Instructional
  + Other programs
  + Sponsor restricted
* Calculated on
  + Salaries and wages
    - Total S&W X F&A rates
  + Total direct costs
    - TDC X F&A rate
  + Modified total direct cost
    - Total DCs less excluded items
    - MTDC F&A rate

**Budget Justification**:

* Major project:

**Institutional Approvals**

**AOR: Authorized organizational representative.**

**AWARD ACCEPTANCE**

Amy Sikalis

Director, Office of Research

Intermountain Healthcare

* Managing research activities:
* Learning the rules that apply: OMB, CFR, FAR, agency guidelines, working with industry guidelines, negotiation skills and agency fundamentals NIH, NSF, RCR.

**Day II**

**AWARD ACCEPTANCE**

Amy Sikalis

Director, Office of Research

Intermountain Healthcare

Commonwealth of PA

Contract language and covering all parties involved.

Pg 199 clinical trials template: from American Academies, <http://www.iom.edu/Activities/Research/DrugForum.aspx>

This is deep soup. Do ever get involved in clinical trials.

Clinical Trials.gov http://www.clinicaltrials.gov/

GCP: Good Clinical Practice guidelines from the FDA.

Shall as verbiage, not must. Most not all.

**What is our Institution policy on record storage, tracking and retention? And does the policy pertain to electronic files, are they purged? What about protected information? Is it locked and encrypted? Is there a contract management tool and/or does RF?**

**What about subject injury during a study? How are our human subjects covered and how is our PI, and are we covered?**

**Ownership of invention: if a bldg. is bonded where the research takes place, the IRS has to be notified if the research is being paid for by a third (private? Industry?) party.**

Contracts have to be terminated, never transferred.

**Do we have a tickler system in place for contract work and reports?**

Applicable Law:

Informed Consent: seeking volunteers for research, they can’t be coerced. Etc.

Pg:77 List of contracting terms.

**Force majeure**: Hurricane yes but unexpected no. It's more like things that would prevent fulfillment of the contract that no one can control and was not foreseeable and no one could reasonably take precaution against. Like stock market crash would not count.

Kris Rhodes, MS, CRA, Director

Higher Education Practice

MAXIMUS

Praying all the time and worried that your not screwing something up.

**POST AWARD**

Check and Balances: what’s our system ?

When you can’t figure something out, get another opinion.

An extra zero can cause all kinds of grief: accuracy is critical.

At time of award, who sets up the budget lines and do they reflect the preaward proposal budget?

Controls? The regulating rules on allowables?

PIs cannot operate with an “open checkbook mentality”.

**Scope creep**: research slows and is reflected in the budget.

## Reform of Federal Policies Relating to Grants and Cooperative Agreements: Cost Principles and Administrative Requirements:  [http://www.regulations.gov/#!documentDetail;D=OMB-2013-0001-0002](http://www.regulations.gov/" \l "%21documentDetail;D=OMB-2013-0001-0002" \t "_blank)

<http://www.evisions.com/>

DAY THREE:

See notebook for notes from yesterday and today.

Panel Questions:

* Misconduct policy: Office Research Integrity (ORI) Template but it works under the assumption there has been misconduct. Look at university websites for policy ideas. Policy and procedures. Plus and annual report.
* When contacting NIH GDS: be professionally friendly, don’t cite regulations back to them. Professional protocol and courtesy. Start with an email. Then have a backup in writing, if nothing, call or re-email. If not a timely response, check for the grant management director.
* **DO WE have a set of PI guidelines for PI responsibilities?**
* CRA Certification: study groups, RA listserv, annual meeting sessions, online courses, materials for self-study, Elliot Kulakowski book on RA and M. Live review makes you aware of what can be on the test. The Encyclopedia of Research Admin from SRA.
* RA opportunities are growing. International in westernized countries.